



Electricity Authority
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Via email: info@electricityAuthority.govt.nz

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Creating Additional Fields in the Registry

Thank you for the opportunity to comment on the consultation paper 'Creating Additional Fields in the Registry'. Powershop's submission is included in the attached appendix.

Please contact me if you have any questions about this submission.

Yours sincerely



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Appendix 1

Question No.	Question	Response
3.8.1	Do you consider the proposals are consistent with the objectives listed in section 3.2.1?	No. Powershop does not consider the R1 and R2 proposals are consistent with the objectives listed in section 3.2.1 as they do not promote efficient operation or competition in the electricity industry.
	In relation to proposal R1, please state:	
3.8.2(a)	whether you support or oppose the proposal	<p>Powershop opposes this proposal (R1) as the Registry is a database of connection information not consumers. This view is reinforced by numerous EA published documents e.g. the Registry Service Provider Agreement states “The Registry is a national database that contains information on every point of connection on a network from which electricity is supplied to a site”</p> <p>Powershop supports the current process of providing the MED with ANZSIC codes on request. The Electricity (Statistics) Regulations 1996 provides the MED the ability to request information, including ANZSIC codes, at any time.</p> <p>Given the immaterial impact of the information being incorrect, Powershop has concerns that participants may become indifferent towards the on-going maintenance of ANZSIC codes every time a customer type changes.</p>



3.8.2(b)	the one-off and ongoing costs, if any, to your organisation	<p>Powershop estimates that implementation of proposal R1 will cost between \$5k and \$10k. On-going costs are estimated to be around \$5k p.a.</p> <p>These estimates do not include the inclusion of the field in the TN file.</p> <p>These costs would ultimately be borne by consumers.</p>
3.8.2(c)	the one-off and ongoing benefits, if any, to your organisation	Powershop does not believe it will benefit from proposal R1.
3.8.2(d)	whether you propose any other amendments, and whether those amendments would change your position in (a)	-
3.8.2(e)	whether you would like the switch TN (RS-010) file amended to include ANZSIC code	No. The TN (RS-030) file is for the transfer of premise, metering and meter read information not customer information.
3.8.2(f)	whether you agree or disagree with the field being visible to other registry users	<p>If this field is added to the Registry it should be hidden from parties other than the current trader and distributor.</p> <p>The visibility of this field on the Registry could provide a way for parties to data mine the Registry for customers that meet their specific requirements. This is not the purpose of the Registry.</p>
3.8.2(g)	any other comments relevant to this proposal	-
	In relation to proposal R2, please state:	
3.8.3(a)	whether you support or oppose the proposal	<p>Powershop opposes this proposal (R2) as it believes there is currently no issue to resolve.</p> <p>If correctly used, the current Registry fields are adequate to ensure all unmetered load is quantified.</p>



3.8.3(b)	the one-off and ongoing costs, if any, to your organisation	<p>Powershop estimates that implementation of proposal R2 will cost between \$5k and \$10k. On-going costs are estimated to be around \$5k p.a.</p> <p>These estimates do not include the inclusion of the field in the TN file.</p> <p>These costs would ultimately be borne by consumers.</p>
3.8.3(c)	the one-off and ongoing benefits, if any, to your organisation	Powershop does not believe it will benefit from proposal R2
3.8.3(d)	whether you propose any other amendments, and whether those amendments would change your position in (a)	<p>Powershop recommends that a notation standard is developed to ensure the current unmetered load fields are being populated in a consistent manner by all parties.</p> <p>This would not change Powershop's position on this proposal, and would instead strengthen the argument for the unnecessary nature of the proposal.</p>
3.8.3(e)	whether you would like the switch TN (RS-010) file amended to include the new unmetered load fields	No. The TN (RS-030) file should not be amended as this could allow the transfer of quantification errors. The current process provides the gaining retailer with an opportunity to recalculate any unmetered load values.
3.8.3(f)	any other comments relevant to this proposal	Appendix 3 Clause 3.2.9 (d) states that the number could not exceed 1440. Powershop is interested to know how the daylight savings switchover days that have 1500 minutes would be handled.
	In relation to proposal D1, please state:	
3.8.4(a)	whether you support or oppose the proposal	Powershop has no comment on this proposal
3.8.4(b)	the one-off and ongoing costs, if any, to your organisation	-
3.8.4(c)	the one-off and ongoing benefits, if any, to your organisation	-



3.8.4(d)	whether you propose any other amendments, and whether those amendments would change your position in (a)	-
3.8.4(e)	any other comments relevant to this proposal	-
	In relation to proposal D2, please state:	
3.8.5(a)	whether you support or oppose the proposal	Powershop has no comment on this proposal
3.8.5(b)	the one-off and ongoing costs, if any, to your organisation	-
3.8.5(c)	the one-off and ongoing benefits, if any, to your organisation	-
3.8.5(d)	whether you propose any other amendments, and whether those amendments would change your position in (a)	-
3.8.5(e)	any other comments relevant to this proposal	-
	In relation to proposal D3, please state:	
3.8.6(a)	whether you support or oppose the proposal	Powershop has no comment on this proposal
3.8.6(b)	the one-off and ongoing costs, if any, to your organisation	-
3.8.6(c)	the one-off and ongoing benefits, if any, to your organisation	-
3.8.6(d)	whether you propose any other amendments, and whether those amendments would change your position in (a)	-
3.8.6(e)	any other comments relevant to this proposal	-
3.8.7	Do you consider the assessment framework in Appendix 4 will enable an appropriate decision about which, if any, proposals are warranted?	Powershop considers that the assessment framework in Appendix 4 will enable an appropriate decision about which, if any, proposals are warranted.